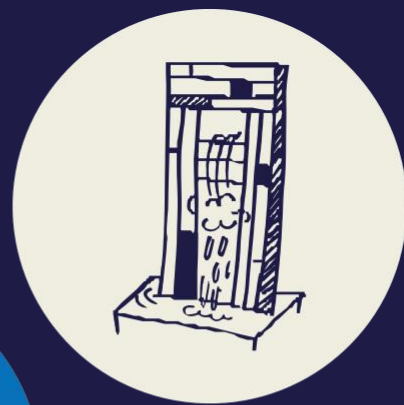


# HAMILTON CITY COUNCIL SUBMISSION ON:

Ministry for the Environment

## Transitioning to a Low-Emissions and Climate-Resilient Future: Emissions Reduction Plan Discussion Document



24 NOVEMBER 2021



**Hamilton  
City Council**  
Te kaunihera o Kirikiriroa

## Improving the Wellbeing of Hamiltonians

Hamilton City Council is focused on improving the wellbeing of Hamiltonians through delivering to our five priorities of shaping:

- A city that's easy to live in
- A city where our people thrive
- A central city where our people love to be
- A fun city with lots to do
- A green city

The topic of this submission is aligned to our **'A green city' priority**.

The focus of this priority is to become a sustainable city by challenging the way we grow our city and how we live within our city. To achieve this, we want to take a thoughtful and city-wide partnership approach between businesses, organisations and community groups to tackle how the city responds to climate change.

## Council Approval and Reference

This submission was approved (under delegated authority) by the Chair and Deputy Chair of Hamilton City Council's Environment Committee and the General Manager Strategy and Communications (as resolved at Hamilton City Council's 11 November 2021 Council meeting).

Hamilton City Council Reference: D-3959165, submission # 670.

## Key Messages

1. We are supportive of the need to reduce emissions and the proposed emissions budgets outlined in the October 2021 Discussion Document **Transitioning to a Low-Emissions and Climate-Resilient Future: Emissions Reduction Plan**.
2. Local Government has a key role in the transition to a low emissions future. This is not well articulated or reflected in the discussion document. Our role to improve the wellbeing of our community means we are well placed to understand the appropriate place-based responses to climate change. The final Emissions Reduction Plan must clearly articulate the role of local government and how central government will work in partnership with local government. Local government need to be further engaged in the development of the final Emissions Reduction Plan to ensure that our role is clearly defined.
3. Alongside the clarity of local government's role, the final Emissions Reduction Plan must outline how the transition will be funded, especially the elements that local government is responsible for. This includes how funding allocations for mode shift will be increased to achieve the mode shift targets.
4. Local Government is currently on the receiving end of a lot of government reform, and it is not clear how climate change is being embedded across all the various reforms. For example, the latest Resource Management Amendment Bill does not align with reducing greenhouse gas emissions from urban environments. For the Emissions Reduction Plan to be effective it must be well integrated across all policies and legislative changes.
5. Hamilton City Council recommend the inclusion of three additional principles to the final Emissions Reduction Plan. Firstly, a phased and strategic approach be taken to achieving emissions reduction. Actions that will achieve the highest emissions first should be prioritised. Secondly, use the most effective tools early to unlock emissions reduction and finally, the transition must be delivered in partnership with iwi, local government and business.
6. We support the development of multi-sector strategy for achieving the net zero 2050 target. However, we recommend that the Government reviews the actions required in line with who is responsible for delivering the change. A strategic approach that acknowledges the capacity and funding requirements for local government must be taken.
7. We are supportive of the need for a comprehensive approach to behaviour change and education on emissions reduction. The actions outlined in the discussion document need to be expanded to include the significant role that local government can play in delivering behaviour change programmes. We support the Climate Change Commission's recommendation that a dedicated behaviour change entity is established and that appropriate funding is provided at both the national and local level.
8. In 2018/2019, 64% of Hamilton's greenhouse gas emissions came from transport. We currently have a high reliance on car travel in the city, however there is significant opportunity as a compact city to increase both the use of active and public transport. An urgent increase in funding is required for mode shift projects in Hamilton. The current funding is inadequate and will not result in the required emissions reductions. The Emissions Reduction Plan needs to clearly outline how the required actions will be funded.

## Introduction

9. Hamilton City Council would like to thank the Ministry for the Environment for the opportunity to make a submission to the October 2021 Discussion Document **Transitioning to a Low-Emissions and Climate-Resilient Future: Emissions Reduction Plan**.
10. Hamilton City Council supports the Government's proposed budgets for 2022–25, 2026–30, 2031–35. However, we highly recommend more work is done to engage with local councils and to establish a clear roadmap of how roles, responsibilities and funding will align to achieve the required emissions reductions. Local government has a key role in the transition to net zero carbon emissions.
11. The transition to a low carbon economy needs to be embedded in all the reforms currently underway that impact on local government. Central government needs to provide a consistent climate change response across all areas of policy and reform.
12. Hamilton City Council support the Government's proposal that a comprehensive, multi-sector strategy is needed to achieve the 2050 target. We understand there is an urgent need to start working towards on climate goals and work across a wide range of sectors needs to be put in effect immediately. However, given local government has a large role in the delivery, we think that a more strategic approach is called for.
13. The final plan needs to include what the key priorities are for the first two budget periods at a minimum, including where the most impact in emissions reduction can be made, so that a clear roadmap can be created. The final plan should outline the actions that will achieve direct emissions reductions and those that are required to unlock future emissions reductions.
14. A key priority is aligning the planning process with the Emissions Reduction Plan (ERP) to support the mode shift required for a low emission future for transport. We support the emphasis to improve public transport, walking and cycling, but believe there needs to be stronger focus at the same time to reduce car travel.
15. Further work needs to be done with local government to better clarify our role and how central government will support local government with capacity development, training, tools, resources, and funding mechanisms needed to be effective.
16. Proper and timely engagement with local government is required to achieve the desired transition to a low emissions and climate resilient future. The detail in the discussion document and the timing of this submission process, alongside many other consultations, has not enabled Hamilton City Council to effectively engage in the development of the ERP.
17. We have responded to the sections most significant to us but acknowledge there are other areas of significance for our rural partners.

## Previous Submissions Made on Climate Change

18. Hamilton City Council takes a considerable interest in matters regarding climate change and has made several submissions in this space in recent years - for example:
  - Hamilton City Council's 16 November 2021 submission to the **Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill** - refer [here](#)

- Hamilton City Council’s 25 June 2021 submission to the **Transport Emissions - Pathways to Net Zero by 2050 - May 2021 Green Paper** - refer [here](#)
  - Hamilton City Council’s 23 June 2021 submission to the **Gas Market Settings Investigation Consultation Paper** - refer [here](#)
  - Hamilton City Council’s 26 March 2021 submission to the **Climate Change Commission - 2021 Draft Advice and Supporting Evidence to Government** - refer [here](#)
  - Hamilton City Council’s 16 October 2020 submission to the **Proposed Changes to Assist Reducing Carbon Emissions in the Building and Construction Sector** - refer [here](#)
  - Hamilton City Council’s 2 July 2019 submission to the **Climate Change Response (Zero Carbon) Amendment Bill** - refer [here](#)
19. Hamilton City Council will also be making a submission to the Ministry for the Environment’s October 2021 discussion document **Taking Responsibility for our Waste: Proposals for a New Waste Strategy - Issues and Options for New Waste Legislation**, which expands further to our comments on Waste and Circular Economy in this document.

## Principles

1. Do you agree that the emissions reduction plan should be guided by a set of principles? If so, are the five principles set out above the correct ones? Please explain why or why not.

20. Hamilton City Council agree that the ERP should be guided by a set of robust principles. To strengthen the approach, we propose three additional principles are added to the five principles outlined in the discussion document:
- A phased and strategic approach.** Required to prioritise the areas for the highest emission savings first. Although the different carbon impacts of each sector are presented, there hasn’t yet been any work that demonstrates where the quick and big wins are. The scale of change needed to get started on this journey will be challenging for all sectors. Local government will play a key role across most of the sectors outlined in this document yet is currently under-resourced to respond and adapt at the speed needed for the scope of activities proposed in the first few years. Understanding and putting more emphasis, funding and support towards our biggest potential carbon savings should allow local government (and other groups) to focus on what matters the most and achieve better results.
  - Use the most effective tools early.** Ensure the right mix of tools are understood. Central government has a key role to provide the right mix of legislation, regulation, incentives, and funding mechanisms. Central government must be prepared to implement legislative changes where it will be effective as early as possible. The shift across all sectors requires a mix of legislative, structural, behaviour and cultural changes, and the dynamics of all elements should be understood as programs are developed. It’s key to understand who is best placed to deliver the change, and the timing needed to approach change strategically. For example, we cannot put the onus on consumers to deal with the waste of companies who are better placed to change their bad packaging habits. Appropriate structural changes need to align with education and behaviour change programmes to increase active travel so it also a convenient choice.
  - Partnership.** Working in partnership with iwi and local government is critical, as well as industry partners, to making decisions that are guided by local perspectives, aspirations, and objectives. Strategic partnering will be key to the success of the plan, with clarity on the role, expectations and responsibilities of the parties involved.

## Funding

21. Hamilton City Council support the direction and initiatives the government is taking to shift the finance sector towards more sustainable investment.

22. We acknowledge there is much more work to be done and recommend further assessment and recognition of the financial impacts current reform will impose on local governments. This should include how the right funding mechanisms can be put in place to help ensure that the low carbon transition is embedded into all reforms to minimise the strain on local government. The development of the ERP and funding and financing tools to support action that contributes to net zero goals needs to align with the broader look at local government funding and financing that is happening via the Future for Local Government Review.
23. The scale of change across our sector makes it clear that rates can not cover what's needed. Directing revenue from the Emissions Trading Scheme (ETS), and alternative mechanisms such as a road tax levy, to local government will be key to support the transition. Further work needs to be done to identify how ETS revenue could also be utilised to fund critical climate change adaptation action.
24. Councils need to be involved in ascertaining how and when funding is made available and should not be competing to receive funding.

## Behaviour Change – Empowering Action

25. Hamilton City Council agree with the need for a national campaign to drive behaviour change and welcome campaigns that drive positive change and align with local aspirations and objectives – local government can support with developing these campaigns.
26. We support the establishment of a behaviour change fund that is available to local government to support change within their communities.
27. We agree with engaging people through consultations, so that the best decisions are made for Aotearoa and our people in the transition. We would like to acknowledge that the timeframe and approach for this consultation was not adequate for effective public engagement and hope to see some more innovative ways to engage the public going forward. We understand that time is lacking, but time must be found to co-develop and share the Government's vision. Creating a solid foundation and buy in is key for success and, if done well, will accelerate emissions reduction.
28. We agree the government should take a central role in driving the scale of behaviour change required but suggest this is in partnership with local government who have the relationships to engage communities and support behaviour change.
29. Parts of local government already work within the realm of behaviour change and have a good understanding of why motivating people to act, encouraging people to make choices, and education alone, rarely results in behaviour change (although they are all still required within the mix of behaviour interventions). Behaviour change 'education' needs to be aligned with a wide range of other behaviour change tools, along with systems and structural changes to support desired behaviours.
30. 'Finding the best way to do it' is not necessarily a key challenge. The government must become adept at understanding and utilising an evidence-based approach to understand what drives behaviour. Much work in this field of 'behaviour insights' has begun, for example the United Kingdom Government's 'Nudge Unit'.
31. It is also of note that the world has looked at the New Zealand Government response to COVID 19 as one of the most effective examples of a social behaviour campaign the world has seen. The Government needs to apply the same importance and level of mobilisation techniques to climate change messaging to ensure the need to act is realised among business and the general public.
32. Hamilton City Council strongly agree with the Climate Change Commission that a lead agency with a specialist understanding of behaviour change should be established and that a national strategic approach is required.

## Making an Equitable Transition

33. Hamilton City Council agree that climate change mitigation should not perpetuate existing disadvantages and agrees with suggested mechanisms to negate this. We do note however that there is more opportunity to ensure a shift to a sustainable economy drives solutions to solve some of our current inequities and support the wellbeing of our communities.
34. Although there is some mention of ways to maximise co-benefits and make sustainable jobs accessible to all, the plan for the equitable transition strategy seems focused on minimising negative impacts. There needs to be more emphasis on how the transition can create positive impacts, such as opportunities for companies to take more responsibility for the impacts their industry has on society as well as opportunities such as employing more people with disabilities or more training or educational needs.
35. A shift to a circular economy offers opportunities to create social enterprise and community-driven approaches to co-create sustainable neighbourhoods such as renewable energy and food share schemes.
36. Hamilton City Council agree that iwi/Maaori are enabled to lead our transition to a more sustainable society. The Government must look to the opportunities that a sustainable economy can offer to address current inequities and disadvantages for Maaori (uplift rather than just 'not perpetuate inequities').
37. Hamilton City Council supports that the equitable transition strategy should be co-designed. Mechanisms must be put in place to ensure the voices of all community members are uplifted and not outweighed by business interest. It is also important that people are given good opportunities to represent themselves and not just by the sectors and organisations that support them (but may not necessarily represent their views).
38. The transition will require significant contribution from local government. There needs to be partnership, not just consultation. Mechanisms need to be in place to ensure key services can still be delivered, and timing needs to be matched with capacity building, resourcing, and funding to ensure local communities are engaged and supported through service transitions.

### 16. How can Government further support households (particularly low-income households) to reduce their emissions footprint?

39. Hamilton City Council support Central Government continuing to invest financial support to address heat poverty and energy efficiency for low-income homeowners and renters and to require improved energy efficiency standards for new homes. Low-income households have the smallest carbon footprint (because they do not have money to spend or invest, which are the biggest contributors to a household carbon footprint), and so are not a high priority to reduce their footprint. More emphasis is needed to nudge high-income households to reduce their emissions footprint in the first instance.
  - Continue working to ensure landlords achieve high standards of providing warm, dry, energy efficient housing and supporting mechanisms for renters that ensure landlords are accountable to achieve required standards.
  - Encouraging investors to make more ethical investment choices.
  - Encouraging enterprise to make sustainable business decisions and employ people with disabilities, educational and training needs.
  - Encouraging high income earners to reduce emissions and ensure a fair taxation system.

## Transport

40. Hamilton City Council agrees that a combined effort from all New Zealanders is required to reduce emissions and build a healthy, safe, and accessible transport system. As stated, local government has a major role in planning and funding transport and urban development at a regional and local level. A strong lead from central government is required now to ensure that all the relevant government departments and Waka Kotahi NZ Transport Agency are aligned with the ERP and recommendations for dealing with conflicting policies and demands are understood. Without a strong focus and priority on achieving emissions budgets, we will become locked into the wrong decisions for years to come.
41. Supporting local governments with guidance, legislation, and appropriate funding will be key to better integrating transport, land use and urban development.
42. The government proposes in Target Area 1 (Budget 1) an assessment of mass transport in Auckland, Wellington and Christchurch. Hamilton City Council proposes that all Tier 1 councils, **including Hamilton City Council**, are assessed. It's key to consider the opportunities to design our transport systems to meet the demands of climate change and the mass population and business growth our smaller cities are soon to experience.
43. **Urban planning** - Placemaking and inclusive street design are important for the future development of urban cities. There are many overseas examples that support and incorporate good design for transport infrastructure which could be adopted here in Aotearoa. There needs to be better incorporation of land use and development that supports and prioritises good active and public transport links to amenities, schools, and workplaces.
44. In Hamilton, we are experiencing out-of-sequence development of greenfield areas - this means that the timing doesn't align with the introduction of public transport services for the development area. The Government could provide the mechanisms for councils to require developers to provide the public and active transport infrastructure to support the initial service delivery in these situations.
45. Hamilton City Council consider that greenfield development should be restricted unless certain criteria are met, or that they have been through existing Government supportive spatial planning initiatives.
46. Out-of-sequence development needs to be better considered against the Strategic Planning Framework, Growth Strategy, Future Development Strategy or approved spatial plans. Options or call for sites could follow a similar Local Area Assessment (LAA) process to that used in the United Kingdom, where there is a call for sites on a rolling basis for site inclusion in District Plans. This enables a proper consideration of sites against other competing National Policy Statements and time to assess actual availability and 'take up' of plan development in plan change proposals before investing time and resources.
47. **Funding and Investment** - The level of funding for walking, cycling and public transport in the Government Policy Statement on Land Transport 2021 (GPS 2021) needs to align with emissions targets going forward. The investment levels in the GPS 2021 are not going to achieve the greenhouse gas emission reductions and mode shift required by the transport sector.
48. Investment in walking and cycling currently makes up only 2% of the national transport budget and consideration should be given to adopting the United Nation's recommendations that 20% of transport funding is allocated to active travel.
49. Investment needs to align with the need to rapidly increase mode shift and should reflect the lack of investment in this area to date. Waiting until 2024 for an updated GPS and Regional Land Transport Plans will be too late.



50. There is a current misalignment between central government's climate change response and funding priorities. The 2021 Government Policy Statement on land transport funding doesn't align with the importance of mode shift and achieving emission reductions in the transport sector over the next three years. Hamilton City Council is disappointed that a number of the mode shift projects in our Long Term Plan have not received co-funding from Waka Kotahi NZ Transport Agency due to a lack of available funding. Unless further funding is urgently made available, progress on these important projects and mode shift targets will be further delayed.
51. We welcome the intent for Government to implement the Hamilton-Waikato Metro Area Mode Shift Plan. However, we need to understand what that intent means and what the funding mechanism will be to see this into reality.
52. The impacts of new public transport options will be minimal if there is continued disproportionate investment in creating new roads. New roads should not be built to ease congestion, as evidence shows this approach has the opposite effect creating higher car ownership and higher congestion.
53. Hamilton City Council would also like to see Government support for reducing public transport fares nationally, including proportionate concessional fares.
54. **Considering climate change in all decisions** - Government policy assessments need to broaden to achieve specific climate goals, otherwise many decisions will counteract work to reduce emissions. It's key that decisions made by Government support climate change goals.
55. **School Travel** - Investing in school travel has multiple benefits beyond reducing emissions and should be a priority for the Government's climate change response. We advocate for free public transport for all school students. For example, in the Bay of Plenty a recent trial of free buses for school students in Tauranga saw a 30% increase in the number of students taking the bus in one year.
56. Funding is required for dedicated school buses, particularly for primary and intermediate schools in urban areas. A number of schools in Hamilton used to run their own school buses but eventually ceased these services due to a lack of funding. Dedicated school bus routes are important because there are a number of barriers to school students using general public bus services, including routes and timetables that don't suit schedules, the need to transfer (which raises safety concerns for students and parents), and concerns around allowing younger children to take the public bus unattended. Hamilton East Primary School still runs its own bus and has a waiting list for it, showing strong demand from students for such a service.
57. A commitment to urgently providing safe routes to school for walking, cycling and scooting for students, with a target for all students within their school zone to have access to safe walking and cycling routes by 2030 is required. Significant safety improvements on school routes could be achieved immediately through interim measures (such as cycle wands), and by slowing speeds and addressing key safety concerns such as crossing points. This infrastructure could then be upgraded with permanent, higher quality walking and cycling infrastructure.
58. Significantly increased funding for school travel coordinators is required. School travel coordinators play an important role in helping schools develop school travel plans and organising active travel initiatives, and increased resourcing would make an immediate impact on school travel behaviour.
59. Funding is required for schools to support initiatives such as walking school buses and bike trains - volunteer systems run by parents are often unsustainable (particularly with more households with two full-time working parents).

**60. E-Bike Subsidies** - The initiatives proposed in the draft plan to increase access to bikes are welcome but should go further to include universal subsidies for e-bikes, cargo bikes and adapted bikes. The public sector e-bike assistance scheme showed that providing discounts on e-bikes (paired with salary advances or other options for interest free loans) is an effective way to encourage more people to cycle, and there are now many overseas examples of successful e-bike subsidy schemes. E-bikes present a significant mode shift opportunity as they make cycling more accessible to a wider range of people and enable people to commute longer distances. Providing a universal subsidy would encourage more people to cycle, reduce financial barriers to accessing e-bikes, and would also be consistent with the existing subsidies for electric vehicles.

**61. Questions specific to discussion paper:**

52. Do you support the target to reduce VKT by cars and light vehicles by 20 per cent by 2035 through providing better travel options, particularly in our largest cities, and associated actions?

**62.** Hamilton City Council agrees that better travel options are key to reducing transport emissions. We support a range of transport modes including zero emission buses, local light rail, national rail travel, free public transport options and designated school buses.

Hamilton City Council supports at least a 20% reduction in VKT. Given that cities will need to play a bigger role in achieving this reduction, we need to understand what this means for Hamilton and work together with Government to establish an appropriate target for our city. Increasing public transport and active travel options alone will not change behaviours in our car reliant society. Public Transport, cycling and other active modes need to become more convenient options for commuting, leisure and business travel in our city centres and out-of-town shopping centres. To better integrate transport, land use and urban development we would recommend prioritising placemaking.

**63.** Hamilton City Council support the need to address better travel options in rural areas. Transport connections are key to changing our regional and national travel. We propose that it would be helpful to assess the needs of rural vs urban areas and set achievable targets appropriate to location and demographics.

53. Do you support the target to make 30 per cent of the light vehicle fleet zero-emissions vehicles by 2035, and the associated actions?

**64.** Hamilton City Council supports the decarbonisation of light vehicles, although note that more emphasis needs to be put onto mode shift. Increasing the number of electric vehicles (EVs) will not solve issues with congestion, parking, health and wellbeing caused by vehicles, and will not set an equitable direction to achieve a mode shift that also creates liveable cities. Currently, the plans won't create the mode shift required by providing quality public and active transport options desirable for all sectors of society.

**65.** Through Hamilton City Council's Climate Change Action Plan, various options are being considered to assist in the transition to full EVs. Currently the cost of putting in EV infrastructure is a barrier for the uptake (including for our own Council fleet). Development of a national EV Infrastructure Plan should include local government, given the need for implementation across the country.

**66.** Funding and clear direction for the design and adequate provision (including accessibility, charger types, ownership/maintenance etc) of charging infrastructure in public spaces is required to ensure local government can keep ahead of public demand and further encourage the uptake of EVs and plug-in hybrid electric vehicles (PHEVs).

**67.** All EVs and hybrids imported into New Zealand should be required to meet a minimum 4- and 5-star rating under the Australasian New Car Assessment Program and Used Car Safety Rating, respectively.

68. We support the investment in electric buses and other public and active transport and mass transit options. Micro-mobility and shared mobility should also be supported along with public charging stations at bike and scooter racks in cities. These two options are growing, and overseas examples demonstrate that the e-bikes, e-scooters and electric shared cars can play a very important role in the transport system. We propose the government support these vehicles as part of the mode shift and mandate that all buses can take bikes and scooters to encourage mixed mode.

54. Do you support the target to reduce emissions from freight transport by 25 per cent by 2035, and the associated actions?

69. Hamilton City Council support the development of a National Freight Strategy that puts decarbonisation of freight as a key outcome. The Strategy should also look at the short, medium, and long-term future of freight and provide clear direction for infrastructure development requirements, such as the Ruakura Inland Port and Logistics Hub located in Hamilton.

## Planning

70. **Urban Planning and Development** - Mandatory planning regulations including the National Policy Statement for Urban Development 2020 need to reflect clearer obligations to meet our emission budgets, and the right tools need to be provided to support a significant shift.
71. The current Resource Management Act Reform poses the opportunity to set a framework to embed a strong climate change response into the guidance and regulation in the new National Planning Framework (NPF). There is however, a current risk that climate becomes a side issue, allowing competing agendas to contradict climate obligations.
72. The recently proposed 'Medium Density Residential Standard' in the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill contradicts the Emissions Reduction Plan and proposes a significant and irreversible step in the wrong direction, undermining the ability to plan for low carbon communities, by allowing for developments with no access to public transport, and without consideration of climate adaptation or resilience.
73. Explicit requirements to consider the impacts on climate change when making decisions on urban development would enable councils to influence good outcomes, for example by planning for places where people can live, work, and play and are able to limit their need to travel, or by making it easy to walk, cycle or take public transport to destinations. Well planned urban form can both ensure our urban areas are resilient to the effects of climate change and can contribute to climate change mitigation.
74. **Integrating emissions into urban planning and funding** - We support that both embodied and operational greenhouse gas emissions should be considered in planning infrastructure. As well as incorporating this into business case guidelines, better tools are required to support infrastructure investors to understand both the embodied and operational emissions and potential cost savings for low emission building options. A national framework is needed to ensure consistent and comparable data.
75. **Questions specific to discussion paper:**

33. In addition to resource management reform, what changes should we prioritise to ensure our planning system enables emissions reductions across sectors? This could include partnerships, emissions impact quantification for planning decisions, improving data and evidence, expectations for crown entities, enabling local government to make decisions to reduce emissions.

76. Creating access to public and active transport modes and proximity to amenities should be a high priority that has clear standards set for new developments. Hamilton City Council support a stronger push away from individual car ownership and reducing the amount of parking available per household. However, this needs to be matched by a requirement for developers to provide public transport, cycling and walking infrastructure within proximity.
77. We are supportive of the objectives and policies in the National Policy Statement for Urban Development that promotes climate action. However, the lack of guidance on how to assess the greenhouse gas emissions of intensification has made it difficult for Tier 1 councils to assess the potential impact of District Plan amendments.
78. When it comes to increasing density in existing neighbourhoods, guidelines need to be in place to ensure there is consideration of how existing infrastructure will cope with increased pressures, and tools need to be developed to understand the carbon impact of potential scenarios such as remain the same, replace or upgrade.
79. Current reforms are a key opportunity to align the planning and funding frameworks with climate mitigation and adaptation and could address how a strong stance on climate change can be met. However, the current scale and scope of reform means that these priorities are not at all clear. Central Government must take a consistent lead role in aligning funding, policy, and legislation throughout all sectors for the ERP to be successful.

## Circular Economy and Bioeconomy

46. How would you define the bioeconomy and what should be in scope of a bioeconomy agenda? What opportunities do you see in the bioeconomy for Aotearoa?

80. A bioeconomy needs to have clear guidelines and standards to ensure it isn't contributing more emissions than the source it is replacing. For example, a biomass burning power plant could potentially emit 150% of the CO<sub>2</sub> emissions of coal, and 300 - 400% of the CO<sub>2</sub> emissions of natural gas. Therefore, biomass should only be in scope if it is producing less emissions than the fuel or product it is replacing.
81. The emission impact of biomass needs to be at the forefront of the bioeconomy agenda. For example, composting practices that minimise anaerobic conditions and maximise aerobic conditions will be the most effective at reducing greenhouse gas emissions, so therefore would be a better use of organic waste than biofuels if other cleaner fuel sources are available.
82. The use of biofuels can in some cases result in problems, such as knock-on emissions due to land use change, degradation of land and increases in food prices. Policies are needed to minimise these downsides by requiring the use of non-food crops and wastes to produce biofuels and disincentivising feedstocks linked to unsustainable land use change.
83. The potential impacts of climate change need to be considered when introducing new technologies. For example, biofuels or other technologies that rely heavily on water are also a risky technology in areas at risk of drought and should not be relied upon as the only source given the unknown potential impacts of climate change.

50. The Commission notes the need for cross-sector regulations and investments that would help us move to a more circular economy. Which regulations and investments should we prioritise (and why)?

84. Priority regulations should include:
  - Regulations that tackle over consumption of natural resources by:

- Taxing products that use virgin natural resources.
- Requiring durability and repairability for electronic goods and furniture sold in New Zealand.
- Requirements for construction to have waste minimisation plans before getting consent.
- Requiring food businesses to demonstrate food reduction plans, food waste separation and use of single use service ware in a limited way to get licenses to operate.
- Product Stewardship – regulating materials that cannot be reused, repaired, or recycled in New Zealand and go to landfill or have high emissions profiles.
- Analysis of material flows in and out of New Zealand and consumption-based emissions.
- Working on trade agreements with the OECD countries to integrate the circular economy.
- Regulated phase-outs of easily recyclable materials from landfill disposal, such as electronic waste, batteries, or food waste in the future.

51. Are there any other views you wish to share in relation to a circular economy and/or bioeconomy?

85. There needs to be an all of government strategy to enable a systems approach to a circular economy to ensure alignment across all sectors.

## Waste

89. The Commission's recommended emissions reduction target for the waste sector significantly increased in its final advice. Do you support the target to reduce waste biogenic methane emissions by 40 per cent by 2035?

86. Hamilton City Council is committed to reducing our biogenic methane emissions. We have recently implemented a successful food scrap collection service to divert organic waste from landfill. We are currently investigating a range of options to further reduce waste to landfill and biogenic methane. Currently, we do not have enough information to assess what the best options are or whether a 40% reduction is achievable by 2035. We would be keen to understand more of what the assumptions are for a 40% reduction are and to share our own investigations into options and potential reductions.

90. Do you support more funding for education and behaviour change initiatives to help households, communities and businesses reduce their organic waste (for example, food, cardboard, timber)?

87. An increase in funding would be welcomed but needs to be supported with a national toolbox of effective behaviour change practitioner education and resources. Education should be timed with changes in our legislation, and systems that make waste minimisation easier. Education alone does not drive behaviour change. An evidence-based approach to how people change behaviours needs to be taken.

91. What other policies would support households, communities and businesses to manage the impacts of higher waste disposal costs?

88. More responsibility needs to put on business to own the full life cycle of their products and packaging to drive better choices.
89. There needs to be regulated product stewardship/extended producer responsibility for all packaging, fashion, building materials and other production sectors.
90. More emphasis should be put on the need for businesses to reduce food waste.

91. An extension of waste levy rates to encourage investment in alternatives to landfill is required.
92. There is a need to define 'waste' and other terms consistently across legislation. For example, applying ETS obligations to all Class 1 sites, not just those with household waste.
93. Durability and repair-ability requirements for electronic products and furniture made and imported into New Zealand needs to be introduced.
94. Currently it can cost the consumer more to do the right thing. There needs to be better options to dispose of products the right way. These should be funded and supported by the companies that manufacture them. For example, it needs to be easier and cheaper for consumers to recycle E-waste than dispose of it in landfill.

92. Would you support a proposal to ban the disposal of food, green and paper waste at landfills for all households and businesses by 1 January 2030, if there were alternative ways to recycle this waste instead?

95. Hamilton City Council agree in principle. However, alternatives need to be co-designed with local government and industry. Funding and incentives need to be in place, and this needs to support those who are transitioning early.

93. Would you support a proposal to ban all organic materials going to landfills that are unsuitable for capturing methane gas?

96. Hamilton City Council would support this and would encourage that this is only a last resort for landfills that are suitable for methane capture if an alternative option is available. Methane capture is not high on either the waste or emissions reduction hierarchy.

94. Do you support a potential requirement to install landfill gas (LFG) capture systems at landfill sites that are suitable?

97. Hamilton City Council would support this for older, large landfill sites with a high level of emissions that will continue for a considerable time. However, other options for disposal of food waste can be explored for newer and currently operating sites. The cost of installing LFG capture systems is not necessarily aligned with the priority for the best options to reduce emissions for waste (appropriate composting facilities could be explored as a higher benefit and lower cost option, and the cost associated with LFG capture could be better utilised). LFG capture does not seem like the best long-term approach.

95. Would you support a more standardised approach to collection systems for households and businesses, which prioritises separating recyclables such as fibre (paper and cardboard) and food and garden waste?

98. Hamilton City Council supports a standardised approach. We have made significant steps to successfully introduce separate food waste, glass and co-mingled recycling collections. A standardised approach would allow better national education, more consistency and less confusion for householders. The same standard collection at work, public places and at home nationally would improve waste behaviour results.
99. A plan for a standardised approach should be developed in partnership with local government. This includes designing appropriate services for high density living and aligning the urban planning rules to prevent health and safety issues whilst maximising diversion from landfill.
100. Separate collections for food, garden waste and paper and cardboard take a lot of resource and education. Local councils already understand that education is only effective for a percentage of the population, and contamination is already a problem in current recycling systems. More analysis needs to be done, for example whether separation of paper and cardboard at source or sorting at transfer stations are the most effective options.

101. How the collections are funded and rolled out should be co-designed with local government.

96. Do you think transfer stations should be required to separate and recycle materials, rather than sending them to landfill?

102. Hamilton City Council support separating of recycling at transfer stations and made a significant commitment to ensure recycling is sorted through our rubbish and recycling contract.

103. Funding that supports social enterprise and social employment models in this industry should be available, as this model has been successful in this sector in both Australia and New Zealand. Other opportunities than recycling (higher up the waste hierarchy) could be explored. For example, the large amount of glass that is recycled that could instead be sorted to be redistributed and reused.

99. What other options could significantly reduce landfill waste emissions across Aotearoa?

104. There is a need to subsidise and promote a wide range of different home compost methods, particularly those suitable to high density housing that is being planned which may not have space for a traditional compost system.

105. Incentives for householders and private companies should be introduced to increase green waste collection as local circular enterprise, supporting a shift of how we deal with 'organic waste', to how we utilise 'organic resource'.

## Energy and Industry

### Energy strategy

58. In your view, what are the key priorities, challenges and opportunities that an energy strategy must address to enable a successful and equitable transition of the energy system?

106. Hamilton City Council supports the initiatives to address affordability and hardship for electricity consumers. Initiatives that address the balance of current inequities should be prioritised. More emphasis needs to be put towards the causes of heat poverty. Landlords must be accountable to provide warm, dry homes. The building sector must be accountable to provide warm, dry housing stock. The funding of programs that support low-income communities to access their own renewable energy systems and sell back to the grid would address some key issues.

107. To create more balance of current inequities there is a need to address the sectors of society that contribute the most carbon emissions yet are the least vulnerable to the impacts of climate change. Strong encouragement and responsibility for high consumers to limit their household energy consumption is needed.

## Building and Construction

108. Hamilton City Council is in principle supportive of initiatives to reduce emissions from buildings – both operational and embodied emissions.

109. Hamilton City Council supports that the Building for Climate Change programme should include rating tools for buildings. We believe high standards should be set. Central Government needs to work closely with local government to understand how green building standards can be regulated, with consideration of the investment needed for local councils to train and build the capacity of staff to effectively implement this.

110. Hamilton is exponentially producing more waste in the construction and demolition sector, as it experiences unprecedented growth. Construction and demolition waste makes up over 50% of the city's total waste stream. The embodied emissions in construction waste are proportionately high to other waste streams. Hamilton City Council propose that waste levy funding is reviewed to support areas with higher volumes of waste. Current levy spend is disproportionate to actual waste stream. This must be reflected to levy spend if waste and emission targets are to be met. A mandate to require additional levy funding to support a decrease in this waste sector would result in less waste to landfill and a reduction in carbon emissions.

78. The Ministry of Business, Innovation and Employment (MBIE) is considering a range of initiatives and incentives to reduce construction waste and increase reuse, repurposing and recycling of materials. Are there any options not specified in this document that you believe should be considered?

111. A fund to support the establishment of building reuse enterprises in regions where none currently exist should be introduced. Without building reuse businesses, it is challenging for businesses to divert building materials for reuse and repurposing, as it is generally uneconomic to transport them out of the region.
112. Drivers to encourage architects and commercial building and renovation projects to incorporate reused building materials are also needed, as some of these enterprises struggle to move on building materials with limited demand in the commercial sector, beyond DIY home build/renovation projects.

## Further Information and Opportunity to Discuss Our Submission

113. Should the Ministry for the Environment require clarification of the submission from Hamilton City Council, or additional information, please contact **Cathy Kopeke** (Sustainability and Climate Change Senior Advisor), email [cathy.kopeke@hcc.govt.nz](mailto:cathy.kopeke@hcc.govt.nz) in the first instance.
114. Hamilton City Council would also welcome the opportunity to meet with representatives from the Ministry for the Environment to discuss the content of our submission in more detail.

Yours faithfully



**Lance Vervoort**  
**CHIEF EXECUTIVE**



Hamilton City Council  
Garden Place, Private Bag 3010, Hamilton

 /HamiltonCityCouncil

 @hamiltoncitycouncil

 07 838 6699

**hamilton.govt.nz**